

### **REMARKS**

This is a full and timely response to the non-final Office Action of May 1, 2008.

Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

Upon entry of this Third Response, claims 1-10 and 12-38 are pending in this application. Claims 33-38 are newly added, and claims 5 and 27, as well as Paragraphs [0023] and [0025], have been directly amended. It is believed that the foregoing amendments add no new matter to the present application.

### **Response to §112 Rejections**

Claims 28-32 presently stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. However, the specification has been amended herein to recite 772 Kbits/sec thereby mooting the rejection under 35 U.S.C. §112, first paragraph. Applicants assert that it was well-known at the time of filing that HDSL signals are communicated at 772 Kbits/sec across each subscriber line, and the instant application clearly describes an embodiment in which the transceivers communicate according to HDSL protocol. See, e.g., Paragraph [0023]. Accordingly, it is believed that the amendment to the specification to explicitly recite 772 Kbits/sec does not constitute new matter. Applicants respectfully request that the 35 U.S.C. §112, first paragraph, rejections of claims 28-32 be withdrawn.

### **Response to §103 Rejections**

In order for a claim to be properly rejected under 35 U.S.C. §103, the combined teachings of the prior art references must suggest all features of the claimed invention to one of ordinary skill in the art. See, e.g., *In Re Dow Chemical Co.*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). In addition, "(t)he PTO has the burden under section 103 to establish a *prima facie* case of obviousness." *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988). Furthermore, the Federal Circuit has stated that "(i)t is impermissible, however, to simply engage in hindsight reconstruction of the claimed invention, using the applicant's structure as a template and selecting elements from references to fill the gaps." *In re Gorman*, 933 F.2d 982, 987, 18 U.S.P.Q.2d 1885 (1991).

#### **Claim 1**

Claim 1 presently stands rejected under 35 U.S.C. §103 as purportedly being unpatentable over *Delvaux* (U.S. Patent No. 6,777,305) in view of *Daruwalla* (U.S. Patent No. 7,058,007) and *Lowell* (U.S. Patent 6,282,265). Claim 1 reads as follows:

1. A communication system, comprising:
  - a first transceiver coupled to a first subscriber line, the first transceiver configured to communicate via the first subscriber line with a remote transceiver that is located at a remote premises and coupled to the first subscriber line, the first subscriber line comprising a first plurality of conductive connections extending from the first transceiver to the remote transceiver coupled to the first subscriber line;
  - a second transceiver coupled to a second subscriber line, the second transceiver configured to communicate via the second subscriber line with a remote transceiver that is located at the remote premises and coupled to the second subscriber line, the second subscriber line comprising a second plurality of conductive connections extending from the second transceiver to the remote transceiver coupled to the second subscriber line;
  - a third transceiver coupled to a third subscriber line, the third transceiver configured to communicate via the third subscriber line with a remote transceiver that is located at the remote premises and coupled to the third subscriber line, the third subscriber line comprising a third plurality of conductive connections extending from the third transceiver to the remote transceiver coupled to the third subscriber line; and

logic configured to receive a data stream comprising data to be received by data communication equipment at the remote premises, the logic configured to split the data stream such that a portion of the data is modulated and transmitted by the first transceiver across the first plurality of conductive connections to the remote transceiver coupled to the first subscriber line while a portion of the data stream is modulated and transmitted by the second transceiver across the second plurality of conductive connections to the remote transceiver coupled to the second subscriber line, ***the logic configured to switch communication from the first transceiver to the third transceiver in response to a detection of a communication problem associated with the first subscriber line such that a portion of the data is modulated and transmitted by the third transceiver across the third plurality of conductive connections to the remote transceiver coupled to the third subscriber line while a portion of the data stream is modulated and transmitted by the second transceiver across the second plurality of conductive connections to the remote transceiver coupled to the second subscriber line, the logic further configured to switch communication from the second transceiver to the third transceiver in response to a detection of a communication problem associated with the second subscriber line such that a portion of the data is modulated and transmitted by the third transceiver across the third plurality of conductive connections to the remote transceiver coupled to the third subscriber line while a portion of the data stream is modulated and transmitted by the first transceiver across the first plurality of conductive connections to the remote transceiver coupled to the first subscriber line.*** (Emphasis added).

Applicants respectfully assert that the alleged combination fails to suggest at least the features of pending claim 1 highlighted hereinabove.

In this regard, in rejecting claim 1, it is alleged in the Office Action that *Delvaux* teaches an American version of the HDSL architecture with two transceivers to provide 1.54 Mbps and a European version with three transceivers to provide 2.048 Mbps. It is further asserted in the Office Action that:

"(s)ince *Delvaux* teaches there are two approaches to implementing an HDSL architecture and *Lowell* teaches spare wire pairs are used in HDSL networks, it would have been obvious to a person of ordinary skill in the art at the time of the invention to use a European three transceiver set to provide T-1 capacity service to optimize the telecommunications network by providing a spare channel to perform, inter alia, out-of-band management functions."

Thus, it is apparently alleged in the Office Action that *Lowell* teaches that a "spare" may be used in a telecommunication system. In the context of HDSL, which is suggested by *Delvaux*, "spares"

have been implemented by employing a backup HDSL circuit that is redundant to at least one primary HDSL circuit. In this regard, the backup circuit, like the primary circuit, has a pair of transceivers. Each HDSL circuit is configured to receive a respective data stream and to split this incoming data stream across its pair of transceivers in order to achieve an aggregate rate of 1.54 Mbps. If the primary circuit fails or if communication via the primary circuit becomes significantly degraded, then the data stream input to the primary circuit is switched to the backup circuit so that 1.54 Mbps can still be maintained. Moreover, there is nothing in the teachings of *Lowell* or *Delvaux* to suggest that a transceiver in an HDSL circuit that splits an incoming data stream across multiple transceivers should be used to backup another transceiver in this **same** circuit. The allegation in the Office Action that it would be obvious to utilize a transceiver to backup other transceivers within the same HDSL circuit, such as a "European transceiver set," is not sufficiently supported by the cited art. "The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification." *In re Fritch*, 972 F.2d 1260, 1266, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). "Modification unwarranted by the disclosure of a reference is improper." *Carl Schenck A.G. v. Nortron Corp.*, 713 F.2d 782, 218 U.S.P.Q. 698, 702 (Fed. Cir. 1983).

In addition, Applicants respectfully assert that a "European transceiver set" is configured to communicate according to protocols different than those employed in North America. Indeed, a European transceiver set could be incompatible with North American services that are based on North American protocols. Accordingly, one of ordinary skill in the art would likely be discouraged from using a "European transceiver set" for North American T-1 services.

Furthermore, a "European transceiver set" presumably has circuitry that is configured to split an incoming data stream and to disperse fragments of such data stream across all three transceivers in the HDSL circuit. Moreover, there is no "spare" transceiver in a "European transceiver set," and the knowledge of the circuit configuration of the "European transceiver set"

would likely lead a person of ordinary skill in a direction divergent from the one proposed in the Office Action in which a transceiver set specifically designed for use in Europe is instead used for North American T-1 services. "A reference may be said to teach away when a person of ordinary skill, upon reading the reference, would be discouraged from following the path set out in the reference, or would be led in a direction divergent from the path that was taken by the applicant." *In re Gurley*, 2 F.3d 551, 31 U.S.P.Q.2d 1130, 1131 (Fed. Cir. 1994). Moreover, when the cited art is properly considered as a whole, including the teachings that teach away from the alleged combination, it is apparent that the rejection of claim 1 is not properly based on the teachings of the cited art but is instead based on impermissible hindsight reconstruction of Applicants' invention.

For at least the above reasons, Applicants respectfully assert that the cited art fails to suggest each feature of claim 1 and the rejection of claim 1 under 35 U.S.C. §103 is improper. Thus, the 35 U.S.C. §103 rejection of claim 1 should be withdrawn.

#### **Claims 2-6 and 28**

Claims 2 and 3 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. In addition, claim 4 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Doll* (U.S. Patent No. 5,694,398), and claim 5 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Renucci* (U.S. Patent No. 6,996,134). Claim 6 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Obelode* (U.S. Patent No. 4,935,642), and claim 28 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux*

in view of *Daruwalla* and *Lowell* and in further view of *Itri* (U.S. Patent No. 5,864,592). Applicants submit that the pending dependent claims 2-6 and 28 contain all features of their respective independent claim 1. Since claim 1 should be allowed, as argued hereinabove, pending dependent claims 2-6 and 28 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 1.

For example, claim 5 recites:

"a control element configured to electrically isolate the first subscriber line from the DC power source when the third transceiver is being used to backup the first transceiver, the control element further configured to electrically couple the first subscriber line to the DC power source when the first transceiver is communicating on the first subscriber line ***such that electrical power is provided by the first subscriber line to the DC power source.***" (Emphasis added).

Applicants respectfully submit that cited art fails to suggest at least the features of claim 5 highlighted above. In this regard, it is acknowledged in the Office Action that *Delvaux*, *Daruwalla*, and *Lowell* do not teach the use of a "control element" and a "power source," as recited by claim 5. However, it is alleged that *Renucci* teaches a power conditioner 64 that injects direct current (DC) into a modulated signal. Thus, it is apparently the position of the Patent Office that the power conditioner 64 of *Renucci* constitutes the "power source" recited by claim 5. However, the power conditioner 64 of *Renucci* appears to provide power **to** the alleged "subscriber line," and electrical power does not appear to be provided "from the first subscriber line to the DC power source," as recited by claim 5. For at least the foregoing reasons, Applicants respectfully assert that the cited art fails to suggest each feature of claim 5, and the 35 U.S.C. §103 rejection of claim 5 should be withdrawn, notwithstanding the allowability of claim 1.

Furthermore, claim 6 recites "a control element configured to sum power from at least two of the subscriber lines." It is acknowledged in the Office Action that *Delvaux*, *Daruwalla*, and *Lowell*

do not teach the features recited by claim 6. However, it is alleged in the Office Action that *Obelode* teaches summation of power as recited in claim 6. Applicants respectfully disagree. In this regard, *Obelode* teaches a system that distributes electrical power from a subscriber line to multiple functional units 10, 11, and 12 that consume such power. The power is not summed but is instead distributed (split) across multiple units 10, 11, and 12. *Obelode* mentions a "sum of the highest possible powers" in the Abstract. However, *Obelode* does not actually sum power, as recited by claim 6, but instead determines a value that is indicative of the total power delivered to the units 10, 11, and 12. Applicants respectfully submit that summing power values that represent power being supplied to the units 10, 11, and 12 is not a summation of the power itself, which is being recited by claim 6.

In addition, when *Obelode* is properly read as a whole, it becomes apparent that *Obelode* does not even sum power values. In this regard, *Obelode* appears to determine a value indicative of the total delivered power by simply measuring the current passing through the control circuit 16. See column 4, lines 32-33. Since the control circuit 16 is at a point in the circuit before the current is split for distribution to the units 10, 11, and 12, there is no reason for the circuit 16 to perform any summation operation.

For at least the above reasons, Applicants respectfully assert that the cited art fails to suggest each feature of claim 6. Accordingly, the 35 U.S.C. §103 rejection of claim 6 should be withdrawn, notwithstanding the allowability of claim 1.

## Claim 7

Claim 7 presently stands rejected under 35 U.S.C. §103 as purportedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. Claim 7 reads as follows:

7. A communication system, comprising:

a first transceiver coupled to a first subscriber line, the first transceiver configured to communicate via the first subscriber line with a remote transceiver that is located at a remote premises and coupled to the first subscriber line, the first subscriber line comprising a first plurality of conductive connections extending from the first transceiver to the remote transceiver coupled to the first subscriber line;

a second transceiver coupled to a second subscriber line, the second transceiver configured to communicate via the second subscriber line with a remote transceiver that is located at the remote premises and coupled to the second subscriber line, the second subscriber line comprising a second plurality of conductive connections extending from the second transceiver to the remote transceiver coupled to the second subscriber line;

a third transceiver coupled to a third subscriber line, the third transceiver configured to communicate via the third subscriber line with a remote transceiver that is located at the remote premises and coupled to the third subscriber line, the third subscriber line comprising a third plurality of conductive connections extending from the third transceiver to the remote transceiver coupled to the third subscriber line; and

logic configured to receive an input data stream comprising data to be received by data communication equipment at the remote premises, the logic configured to split the data stream into at least a first output data stream and a second output data stream, wherein the first transceiver is configured to transmit at least a portion of the first output data stream across the first subscriber line while the second transceiver is transmitting at least a portion of the second output data stream across the second subscriber line, ***the logic further configured to enable the third transceiver to selectively backup both of the first and second transceivers such that the third transceiver communicates a portion of either the first or second output data stream in response to a detection of a communication problem while one of the first and second transceivers is communicating a portion of the other output data stream.*** (Emphasis added).

For at least reasons similar to those set forth above in the arguments for allowance of claim 1, Applicants respectfully assert that the cited art fails to suggest at least the features of claim 7 highlighted above. Thus, the 35 U.S.C. §103 rejection of claim 7 should be withdrawn.



### **Claims 8-10, 12, 24-26, 29, and 33-37**

Claims 8 and 24-26 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. In addition, claim 9 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Doll*, and claim 10 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Obelode*. Also, claim 12 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Renucci*, and claim 29 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Itri*. Further, claims 33-37 have been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 8-10, 12, 24-26, 29, and 33-37 contain all features of their respective independent claim 7. Since claim 7 should be allowed, as argued hereinabove, pending dependent claims 8-10, 12, 24-26, 29, and 33-37 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Claim 13**

Claim 13 presently stands rejected under 35 U.S.C. §103 as purportedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. Claim 13 reads as follows:

13. A communication system, comprising:
  - a first transceiver coupled to a first subscriber line, the first transceiver configured to communicate via the first subscriber line with a remote transceiver that is located at a remote premises and coupled to the first subscriber line, the first subscriber line comprising a first plurality of conductive connections extending from the first transceiver to the remote transceiver coupled to the first subscriber line;
  - a second transceiver coupled to a second subscriber line, the second transceiver configured to communicate via the second subscriber line with a

remote transceiver that is located at the remote premises and coupled to the second subscriber line, the second subscriber line comprising a second plurality of conductive connections extending from the second transceiver to the remote transceiver coupled to the second subscriber line;

a third transceiver coupled to a third subscriber line, the third transceiver configured to communicate via the third subscriber line with a remote transceiver that is located at the remote premises and coupled to the third subscriber line, the third subscriber line comprising a third plurality of conductive connections extending from the third transceiver to the remote transceiver coupled to the third subscriber line; and

logic configured to split an input data stream into at least a first output data stream and a second output data stream, the logic configured to interface the first and second output data streams with the first and second transceivers such that the first and second transceivers respectively transmit the first and second output data streams on the first and second subscriber lines, ***the logic further configured to interface one of the output data streams with the third transceiver in response to a communication problem associated with one of the first and second subscriber lines, the logic further configured to dynamically select the one output data stream for interfacing with the third transceiver based on which of the first and second subscriber lines is associated with the communication problem.*** (Emphasis added).

For at least reasons similar to those set forth above in the arguments for allowance of claim 1, Applicants respectfully assert that the cited art fails to suggest at least the features of claim 13 highlighted above. Thus, the 35 U.S.C. §103 rejection of claim 13 should be withdrawn.

#### **Claims 14-16 and 30**

Claim 15 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Renucci*. In addition, claim 14 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Doll*, and claim 16 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Obelode*. Further, claim 30 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view

of *Itri*. Applicants submit that the pending dependent claims 14-16 and 30 contain all features of their respective independent claim 13. Since claim 13 should be allowed, as argued hereinabove, pending dependent claims 14-16 and 30 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Claim 17**

Claim 17 presently stands rejected under 35 U.S.C. §103 as purportedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. Claim 17 reads as follows:

17. A communication method, comprising the steps of:  
 receiving a data stream;  
 splitting the data stream into at least a first data stream and a second data stream;  
*communicating at least a portion of the first data stream between a first pair of transceivers on a first subscriber line*, the first subscriber line extending from one of the first pair of transceivers to the other of the first pair of transceivers and comprising a first twisted pair;  
*communicating, during the communicating at least the portion of the first data stream step, at least a portion of the second data stream between a second pair of transceivers on a second subscriber line*, the second subscriber line extending from one of the second pair of transceivers to the other of the second pair of transceivers and comprising a second twisted pair; and  
*enabling a third pair of transceivers coupled to a third subscriber line to selectively backup both of the first and second pair of transceivers such that the third pair of transceivers communicates a portion of either the first or second data stream in response to a detection of a communication problem during one of the communicating steps*, the third subscriber line extending from one of the third pair of transceivers to the other of the third pair of transceivers and comprising a twisted pair. (Emphasis added).

For at least reasons similar to those set forth above in the arguments for allowance of claim 1, Applicants respectfully assert that the cited art fails to suggest at least the features of claim 17 highlighted above. Thus, the 35 U.S.C. §103 rejection of claim 17 should be withdrawn.

### **Claims 18-20, 27, and 38**

Claims 18 and 27 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. In addition, claim 19 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Doll*, and claim 20 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Obelode*. Also, claim 31 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Itri*. Further, claim 38 has been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 18-20, 27, 31, and 38 contain all features of their respective independent claim 17. Since claim 17 should be allowed, as argued hereinabove, pending dependent claims 18-20, 27, 31, and 38 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Claim 21**

Claim 21 presently stands rejected under 35 U.S.C. §103 as purportedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell*. Claim 21 reads as follows:

21. A communication method, comprising the steps of:  
splitting a data stream into a first data stream and a second data stream;  
interfacing the first data stream with a first transceiver such that the first data stream is communicated by the first transceiver on a first subscriber line to a remote transceiver that is located at a remote premises and coupled to the first subscriber line, the first subscriber line comprising a first plurality of conductive connections extending from the first transceiver to the remote transceiver coupled to the first subscriber line;  
interfacing, during the interfacing the first data stream step, the second data stream with a second transceiver such that the second data stream is communicated by the second transceiver on a second subscriber line to a remote transceiver that is located at the remote premises and coupled to the second subscriber line, the second subscriber line comprising a first plurality of conductive

connections extending from the second transceiver to the remote transceiver coupled to the second subscriber line;

detecting a communication problem associated with one of the first and second subscriber lines;

***interfacing, in response to the detecting step and during one of the interfacing steps, one of the first and second data streams with a third transceiver such that the one data stream is communicated by the third transceiver on a third subscriber line*** to a remote transceiver that is located at the remote premises and coupled to the third subscriber line, the third subscriber line comprising a third plurality of conductive connections extending from the third transceiver to the remote transceiver coupled to the third subscriber line; and

dynamically selecting the one data stream to be interfaced with the third transceiver in response to the detecting step based on which of the first and second subscriber lines is associated with the communication problem. (Emphasis added).

For at least reasons similar to those set forth above in the arguments for allowance of claim 1, Applicants respectfully assert that the cited art fails to suggest at least the features of claim 21 highlighted above. Thus, the 35 U.S.C. §103 rejection of claim 21 should be withdrawn.

### **Claims 22, 23, and 32**

Claim 22 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Doll*, and claim 23 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and further in view of *Obelode*. In addition, claim 32 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Delvaux* in view of *Daruwalla* and *Lowell* and in further view of *Itri*. Applicants submit that the pending dependent claims 22, 23, and 32 contain all features of their respective independent claim 21. Since claim 21 should be allowed, as argued hereinabove, pending dependent claims 22, 23, and 32 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).


**CONCLUSION**

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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